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14 *Counsel to the Official Committee of Tort Claimants*

15 **UNITED STATES BANKRUPTCY COURT**
16 **NORTHERN DISTRICT OF CALIFORNIA**
17 **SAN FRANCISCO DIVISION**

18 **In re:**

19 **PG&E CORPORATION**

20 **-and-**

21 **PACIFIC GAS AND ELECTRIC
COMPANY,**

22 **Debtors.**

23 Affects PG&E Corporation
24 Affects Pacific Gas and Electric Company
25 Affects both Debtors

26 *All papers shall be filed in the Lead Case,
27 No. 19-30088 (DM)

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Bankruptcy Case
No. 19-30088 (DM)

Chapter 11
(Lead Case)
(Jointly Administered)

**PRELIMINARY REPORT OF
OFFICIAL COMMITTEE OF TORT
CLAIMANTS' INVESTIGATION OF
VOTING RESULTS**

**TO THE HONORABLE DENNIS MONTALI, UNITED STATES BANKRUPTCY
COURT, BOSTON, MASSACHUSETTS**

The Official Committee of Tort Claimants (the “TCC”) submits the following report of its investigation into the solicitation and tabulation of fire victim votes in response to the Court’s request made during the hearing held on June 5, 2020.

1. Some fire victims have filed papers and contacted the TCC with complaints about the Debtors' solicitation and tabulation of votes from the fire victim class. The complaints allege, among other claims: victim's non-receipt of voting ballots and disclosure materials before the voting deadline; receipt of voting ballots and disclosure materials too close to the voting deadline; receipt of multiple ballots for the same claimant; receipt of solicitation materials from the incorrect law firm; issues with submission of votes in connection with the Master Ballot process; and the alleged failure of Prime Clerk to respond to fire victim inquiries.
2. In response to these allegations, the TCC requested PG&E to produce information relating to the solicitation and tabulation process and to supplement the data it attached to court filings, including the Declaration and Certificates of Service of Christina Pullo from Prime Clerk LLC [Docket Nos. 6893, 7348, 7505]. The Debtors responded to all of the TCC's requests for information and data to date and made representatives from Prime Clerk available to the TCC and its consultants to respond to the TCC questions about the data and tabulation process.
3. The TCC's counsel and consultants have reviewed the above-referenced data as well as Ms. Pullo's testimony before this Court and are close to completing their analysis of this information. The TCC is without sufficient information to determine why certain fire victims failed to submit a vote (including whether any particular fire victim received a solicitation package). However, the TCC compared the Debtors' data on tabulated and excluded fire claimant votes to the TCC's fire claimant data developed during the course of the estimation proceeding in order to address many of the concerns outlined above, including those relating

1 to duplicative and excluded votes as well as certain concerns relating to the Master
2 Ballot Process.

3 4. To date, the TCC's counsel and consultants have not identified any evidence of a
5 voting issue in the data that the consultants believe would have affected the two
6 thirds threshold required for approval by the fire victim class.
7 5. The TCC intends to continue its investigation until concluded. If requested by the
8 Court, the TCC will file a report with the Court on the results of its investigation in
9 two weeks.

10 Dated: June 9, 2020

Respectfully submitted,

11 12 BAKER & HOSTETLER LLP

13 By: /s/ Kimberly S. Morris
14 Robert A. Julian
Kimberly S. Morris

15 *Counsel to the Official Committee of Tort
16 Claimants*